



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
NASHVILLE, TENNESSEE 37243-0435

ROBERT J. MARTINEAU, JR.
COMMISSIONER

BILL HASLAM
GOVERNOR

October 16, 2015

Via First Class and Electronic Mail to jlampley@fs.fed.us

Jonathan Lampley
Watauga Ranger District
P.O. Box 400, Unicoi, TN, 37692

Dear Jonathan Lampley:

The Tennessee Department of Environment and Conservation (TDEC) appreciates the opportunity to provide comments on the categorically excluded *Flumine Forest Health Project*, *Flumine Prescribed Burn Project*, *Heaberlin Forest Health Project*, *Heaberlin Prescribed Burn Project*, *Ligna Forest Health Project*, and *Ligna Prescribed Burn Project*. The applicant, the United States Department of Agriculture Forest Service (Forest Service), proposes vegetation management (thinning) activities designed to maintain a healthy forest and low intensity burn to move stands toward an open woodland condition. These projects, all of which are sited within Johnson County, Tennessee, are intended to improve the vegetation and create more open forest conditions in the proposed areas.

Each of these proposed actions are categorically excluded from documentation in an Environmental Assessment or an Environmental Impact Statement pursuant to 36 CFR 220.6(e)(12) and 36 CFR 220.6(e)(6), respectively.

Actions considered within the project proposals include:

- Applicant Proposed Action for Flumine Forest Health Project –Forest Service would thin the stands with variable density to a range of basal areas from 35 to 60 square foot (sq. ft.) per acre. The proposed area is < 70 acres and is located in Compartment 48. Priority of removal will be damaged/disease trees first followed by white pine, red maple, poplar, scarlet oak, and black oak. Following the thinning, damaged and/or undesirable understory and mid-story trees would be slashed.
- Applicant Proposed Action for Flumine Prescribed Burn Project –Forest Service would conduct low intensity burns to move stands toward an open woodland condition and promote upland oak, shortleaf pine, and more open forest conditions. The burn block is 213 acres and the project may include repeated low-intensity burns, with the burning cycle dependent on the objectives being met. Burns may continue on a two to ten-year rotation.
- Applicant Proposed Action for Heaberlin Forest Health Project –Forest Service would thin the stands with variable density to a range of basal areas from 35 to 60 sq. ft. per acre. The proposed area is < 70 acres and is located in Compartment 80. Priority of removal will be damaged/disease trees first followed by white pine, red maple, poplar, scarlet oak, and black oak. Following the thinning, damaged and/or undesirable understory and mid-story trees would be slashed.
- Applicant Proposed Action for Heaberlin Prescribed Burn Project –Forest Service would conduct low intensity burns to move stands toward an open woodland condition and promote upland oak, shortleaf pine, and more open forest conditions. The burn block is 382 acres and the project may

include repeated low-intensity burns, with the burning cycle dependent on the objectives being met. Burns may continue on a two to ten-year rotation.

- Applicant Proposed Action for Ligna Forest Health Project –Forest Service would thin the stands with variable density to a range of basal areas from 35 to 60 sq. ft. per acre. The proposed area is < 70 acres and is located in Compartment 49. Priority of removal will be damaged/disease trees first followed by white pine, red maple, poplar, scarlet oak, and black oak. Following the thinning, damaged and/or undesirable understory and mid-story trees would be slashed.
- Applicant Proposed Action for Ligna Prescribed Burn Project –Forest Service would conduct low intensity burns to move stands toward an open woodland condition and promote upland oak, shortleaf pine, and more open forest conditions. The burn block is 160 acres and the project may include repeated low-intensity burns, with the burning cycle dependent on the objectives being met. Burns may continue on a two to ten-year rotation.

TDEC's **Division of Natural Areas (DNA)** has reviewed the project proposals and encourages the use of fire to restore and manage the forest habitat. Based on the data within DNA's database and the project locations, DNA does not anticipate adverse impacts upon rare, threatened, and endangered plant species.

TDEC's **Division of Air Pollution Control (APC)** has reviewed the project proposals. APC recommends that the Forest Service employ a smoke management plan for all open burning projects. APC also recommends that the Forest Service consult with the State Division of Forestry and State Division of Air Pollution Control on the actual burn plans and dates for burning in advance.¹ Lastly, APC recommends that the proximity to roads and airports be considered in order to avoid potential visibility impaired issues.

Staff representing TDEC's **Tennessee State Parks and Real Property Management** has reviewed the project proposals and has no specific comments regarding the proposed actions at this time.

TDEC appreciates the opportunity to comment on these project proposals. Please note that these comments are not indicative of approval or disapproval of the proposed actions, nor should they be interpreted as an indication of all necessary permits that may be required from TDEC should actions be taken. Please contact me should you have any questions regarding these comments.

Sincerely,



Michelle Walker Owenby
Assistant Commissioner of Policy and Planning
Phone: (615) 532-9668

cc: Stephanie Williams, TDEC, DNA
Lacey Hardin, TDEC, APC
Bill Avant, TDEC, TSP
Kendra Abkowitz, TDEC, POL

¹ The dates selected for burning should be identified in a manner that avoids periods of actual or anticipated poor air quality and should be conducted during periods with good dispersion characteristics.